## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO 2016 APR 27 AM 10: 03

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UNITED STATES OF AMERICA,

CASE NO.

6.5. Di\$116.0 SOUTHERN DIST. OHIO HAST, DIV. COLUMBUS

Plaintiff,

**JUDGE** 

v.

2:16 cr

SHANE M. MAUGER.

Judge Marbley

Defendant.

INFORMATION

## THE UNITED STATES ATTORNEY CHARGES:

## **COUNT ONE**

(18 U.S.C. § 241: Conspiracy to Deprive Persons of Civil Rights)

1. From in or around November 2006, through on or about February 18, 2016, in the Southern District of Ohio, the defendant, SHANE M. MAUGER, knowingly and willfully conspired with others, both known and unknown to the United States, to injure and oppress third parties in the free exercise and enjoyment of rights secured to them by the Constitution of the United States—namely, the right to be free from unreasonable searches and seizures by those acting under color of law, a right secured by the Fourth and Fourteenth Amendments to the Constitution of the United States; and the right not to be deprived of property, by those acting under color of law, without due process of law, a right secured by the Fourteenth Amendment to the Constitution of the United States—in violation of 18 U.S.C. § 241.

## **COUNT TWO** (18 U.S.C. § 666(a)(1)(A): Federal Program Theft)

2. From in or around November 2006, through on or about February 18, 2016, the defendant, SHANE M. MAUGER, was an agent of an agency of a local government in the Southern District of Ohio-namely, the Reynoldsburg Division of Police.

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The Reynoldsburg Division of Police and the City of Reynoldsburg each received

benefits, including grants, contracts, subsidiaries, loans, guarantees, insurance, and other forms of

Federal assistance, in excess of \$10,000 in the one-year period beginning January 1, 2015.

4. From in or around November 2006, through on or about February 18, 2016, in the

Southern District of Ohio, the defendant, SHANE M. MAUGER, stole, obtained by fraud, and

without authority knowingly converted to the use of a person not the rightful owner property worth

at least \$5,000 and under the care, custody, and control of the Reynoldsburg Division of

Police—namely, money and property seized pursuant to search warrants.

All in violation of 18 U.S.C. § 666(a)(1)(A).

BENJAMIN C. GLASSMAN Acting United States Attorney

PETER K. GLENN-APPLEGATE

Assistant United States Attorney